

Approved, SCAO

Original - Court
1st copy - Plaintiff2nd copy - Defendant
3rd copy - Proof of serviceSTATE OF MICHIGAN
X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 1 OF 7)CASE NO.
4:16-cv-10751-TGB-APP

Court address

Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226

Court telephone no.

(313) 234-5000

Plaintiff's name(s), address(es), and telephone no(s).

FATHERS & DAUGHTERS
NEVADA, LLC.

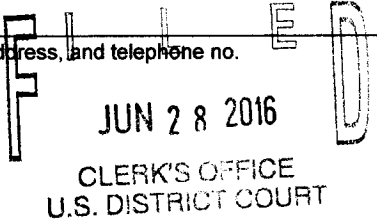
Plaintiff's attorney, bar no., address, and telephone no.

Barry C. Kane (P4581) KANE & CO., PLC
451 Camino del Monte Sol Santa Fe, NM 87505
(505)670-2160
bkane@kanepc.com

Defendant's name(s), address(es), and telephone no(s).

Evan Keller
200 N Occidental Apt. 56
Tecumseh, MI 49286
(517)920-3767

Defendant's attorney, bar no., address, and telephone no.


 JUN 28 2016
CLERK'S OFFICE
U.S. DISTRICT COURT

- ☒ Defendant,
☐ Attorney for defendant, in answer to the complaint, states:

(Paragraph numbers in the answer must correspond to paragraphs in the complaint. Attach additional sheets if necessary.)

1. I ☐ agree with the statements in paragraph 1.
☒ disagree with the statements in paragraph 1 because I'm not responsible for the acquisition, copying, or transfer.
☐ do not know if the statements in paragraph 1 are true.
2. I ☐ agree with the statements in paragraph 2.
☐ disagree with the statements in paragraph 2 because _____.
☒ do not know if the statements in paragraph 2 are true.
3. I ☐ agree with the statements in paragraph 3.
☒ disagree with the statements in paragraph 3 because I did not download this copyrighted movie.
☐ do not know if the statements in paragraph 3 are true.
4. I ☐ agree with the statements in paragraph 4.
☐ disagree with the statements in paragraph 4 because _____.
☒ do not know if the statements in paragraph 4 are true.
5. I ☐ agree with the statements in paragraph 5.
☐ disagree with the statements in paragraph 5 because _____.
☒ do not know if the statements in paragraph 5 are true.

☒ continued on page 2.Date 6/23/16

Defendant/Attorney signature

Evan Keller

Name (type or print)

IMPORTANT: If you have affirmative defenses, you must state them now using the last page of this form. If you do not, the court may prohibit you from raising them later. An affirmative defense is a defense claiming that the plaintiff is not entitled to a judgment because other facts exist that create a lawful defense. Affirmative defenses allow you to provide information to the court that is not stated in the plaintiff's complaint.

CERTIFICATE OF SERVICE

I certify that on this date I served a copy of this answer on the plaintiff(s) or their attorney(s) by
☐ personal service. ☒ first-class mail addressed to their last-known address(es) as defined in MCR 2.107(C)(3).

Date

Signature

Approved, SCAO

STATE OF MICHIGAN
X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 2 OF 7)

CASE NO.

4:16-cv-10751-TGB-APP

Plaintiff's name(s)

FATHERS & DAUGHTERS NEVADA, LLC.

v

Defendant's name(s)

Evan Keller

continued from page 1.

6. I ☐ agree with the statements in paragraph 6.
☐ disagree with the statements in paragraph 6 because _____
☒ do not know if the statements in paragraph 6 are true.
7. I ☐ agree with the statements in paragraph 7.
☒ disagree with the statements in paragraph 7 because I did not participate in the distribution of the motion picture
☐ do not know if the statements in paragraph 7 are true.
8. I ☐ agree with the statements in paragraph 8.
☐ disagree with the statements in paragraph 8 because _____
☒ do not know if the statements in paragraph 8 are true.
9. I ☐ agree with the statements in paragraph 9.
☒ disagree with the statements in paragraph 9 because If my IP was used illegally it was unauthorized by me
☐ do not know if the statements in paragraph 9 are true.
10. I ☐ agree with the statements in paragraph 10.
☐ disagree with the statements in paragraph 10 because _____
☒ do not know if the statements in paragraph 10 are true.
11. I ☐ agree with the statements in paragraph 11.
☐ disagree with the statements in paragraph 11 because _____
☒ do not know if the statements in paragraph 11 are true.
12. I ☐ agree with the statements in paragraph 12.
☐ disagree with the statements in paragraph 12 because _____
☒ do not know if the statements in paragraph 12 are true.
13. I ☐ agree with the statements in paragraph 13.
☐ disagree with the statements in paragraph 13 because _____
☒ do not know if the statements in paragraph 13 are true.
14. I ☐ agree with the statements in paragraph 14.
☐ disagree with the statements in paragraph 14 because _____
☒ do not know if the statements in paragraph 14 are true.
15. I ☐ agree with the statements in paragraph 15.
☐ disagree with the statements in paragraph 15 because _____
☒ do not know if the statements in paragraph 15 are true.
16. I ☐ agree with the statements in paragraph 16.
☐ disagree with the statements in paragraph 16 because _____
☒ do not know if the statements in paragraph 16 are true.
17. I ☐ agree with the statements in paragraph 17.
☐ disagree with the statements in paragraph 17 because _____
☒ do not know if the statements in paragraph 17 are true.

☒ continued on page 3.

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STATE OF MICHIGAN
X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 3 OF 7)CASE NO.
4:16-cv-10751-TGB-APP

Plaintiff's name(s)

FATHERS & DAUGHTERS NEVADA, LLC.

v

Defendant's name(s)

Evan Keller

continued from page 2.

18. I ☐ agree with the statements in paragraph 18.
☐ disagree with the statements in paragraph 18 because _____
☒ do not know if the statements in paragraph 18 are true.
19. I ☐ agree with the statements in paragraph 19.
☐ disagree with the statements in paragraph 19 because _____
☒ do not know if the statements in paragraph 19 are true.
20. I ☐ agree with the statements in paragraph 20.
☐ disagree with the statements in paragraph 20 because _____
☒ do not know if the statements in paragraph 20 are true.
21. I ☐ agree with the statements in paragraph 21.
☐ disagree with the statements in paragraph 21 because _____
☒ do not know if the statements in paragraph 21 are true.
22. I ☐ agree with the statements in paragraph 22.
☐ disagree with the statements in paragraph 22 because _____
☒ do not know if the statements in paragraph 22 are true.
23. I ☐ agree with the statements in paragraph 23.
☐ disagree with the statements in paragraph 23 because _____
☒ do not know if the statements in paragraph 23 are true.
24. I ☐ agree with the statements in paragraph 24.
☐ disagree with the statements in paragraph 24 because _____
☒ do not know if the statements in paragraph 24 are true.
25. I ☐ agree with the statements in paragraph 25.
☒ disagree with the statements in paragraph 25 because My name should be removed from this list, I am innocent
☐ do not know if the statements in paragraph 25 are true.
26. I ☐ agree with the statements in paragraph 26.
☐ disagree with the statements in paragraph 26 because _____
☒ do not know if the statements in paragraph 26 are true.
27. I ☐ agree with the statements in paragraph 27.
☐ disagree with the statements in paragraph 27 because _____
☒ do not know if the statements in paragraph 27 are true.
28. I ☐ agree with the statements in paragraph 28.
☐ disagree with the statements in paragraph 28 because _____
☒ do not know if the statements in paragraph 28 are true.
29. I ☐ agree with the statements in paragraph 29.
☐ disagree with the statements in paragraph 29 because _____
☒ do not know if the statements in paragraph 29 are true.
- ☒ continued on additional page(s).

Approved, SCAO

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X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 4 OF 7)CASE NO.
4:16-cv-10751-TGB-APP

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Plaintiff's attorney, bar no., address, and telephone no.

Barry C. Kane (P4581) KANE & CO., PLC
451 Camino del Monte Sol Santa Fe, NM 87505
(505)670-2160
bkane@kanepc.com

Defendant's name(s), address(es), and telephone no(s).

Evan Keller
200 N Occidental Apt. 56
Tecumseh, MI 49286
(517)920-3767

Defendant's attorney, bar no., address, and telephone no.

☒ Defendant,☐ Attorney for defendant, in answer to the complaint, states:(Paragraph numbers in the answer must correspond to paragraphs
in the complaint. Attach additional sheets if necessary.)

30.

- ☒ I agree with the statements in paragraph 30.
- ☐ disagree with the statements in paragraph 30 because _____
- ☒ do not know if the statements in paragraph 30 are true.

31.

- ☐ I agree with the statements in paragraph 31.
- ☐ disagree with the statements in paragraph 31 because _____
- ☒ do not know if the statements in paragraph 31 are true.

32.

- ☐ I agree with the statements in paragraph 32.
- ☐ disagree with the statements in paragraph 32 because _____
- ☒ do not know if the statements in paragraph 32 are true.

33.

- ☐ I agree with the statements in paragraph 33.
- ☐ disagree with the statements in paragraph 33 because _____
- ☒ do not know if the statements in paragraph 33 are true.

34.

- ☐ I agree with the statements in paragraph 34.
- ☐ disagree with the statements in paragraph 34 because _____
- ☒ do not know if the statements in paragraph 34 are true.

☒ continued on page 4.6/23/16
Date
Defendant/Attorney signature

Evan Keller

Name (type or print)

IMPORTANT: If you have affirmative defenses, you must state them now using the last page of this form. If you do not, the court may prohibit you from raising them later. An affirmative defense is a defense claiming that the plaintiff is not entitled to a judgment because other facts exist that create a lawful defense. Affirmative defenses allow you to provide information to the court that is not stated in the plaintiff's complaint.

CERTIFICATE OF SERVICE

I certify that on this date I served a copy of this answer on the plaintiff(s) or their attorney(s) by

☐ personal service.☒ first-class mail addressed to their last-known address(es) as defined in MCR 2.107(C)(3).6/23/16
Date
Signature

Approved, SCAO

STATE OF MICHIGAN X JUDICIAL DISTRICT JUDICIAL CIRCUIT	ANSWER, CIVIL (PAGE 5 OF 7)	CASE NO. 4:16-cv-10751-TGB-APP
-----------------------------------------------------------------------------------	----------------------------------------------	------------------------------------------

Plaintiff's name(s)

v

Defendant's name(s)

continued from page 4

35. I ☐ agree with the statements in paragraph 35. ☐ disagree with the statements in paragraph 35 because ☒ do not know if the statements in paragraph 35 are true.
36. I ☐ agree with the statements in paragraph 36. ☐ disagree with the statements in paragraph 36 because ☒ do not know if the statements in paragraph 36 are true.
37. I ☐ agree with the statements in paragraph 37. ☐ disagree with the statements in paragraph 37 because ☒ do not know if the statements in paragraph 37 are true.
38. I ☐ agree with the statements in paragraph 38. ☐ disagree with the statements in paragraph 38 because ☒ do not know if the statements in paragraph 38 are true.
39. I ☐ agree with the statements in paragraph 39. ☒ disagree with the statements in paragraph 39 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 39 are true.
40. I ☐ agree with the statements in paragraph 40. ☒ disagree with the statements in paragraph 40 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 40 are true.
41. I ☐ agree with the statements in paragraph 41. ☒ disagree with the statements in paragraph 41 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 41 are true.
42. I ☐ agree with the statements in paragraph 42. ☒ disagree with the statements in paragraph 42 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 42 are true.
43. I ☐ agree with the statements in paragraph 43. ☒ disagree with the statements in paragraph 43 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 43 are true.
44. I ☐ agree with the statements in paragraph 44. ☒ disagree with the statements in paragraph 44 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 44 are true.
45. I ☐ agree with the statements in paragraph 45. ☒ disagree with the statements in paragraph 45 because I never downloaded, reproduced, or distributed this file ☐ do not know if the statements in paragraph 45 are true.
46. I ☐ agree with the statements in paragraph 46. ☐ disagree with the statements in paragraph 46 because ☒ do not know if the statements in paragraph 46 are true.

☒ continued on page 3.

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STATE OF MICHIGAN
X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 6 OF 7)

CASE NO.

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Plaintiff's name(s)

v

Defendant's name(s)

continued from page 2.

47. I ☐ agree with the statements in paragraph 47. ☒ disagree with the statements in paragraph 47 because I never downloaded, reproduced, or distributed this file.
☐ do not know if the statements in paragraph 47 are true.
48. I ☐ agree with the statements in paragraph 48. ☐ disagree with the statements in paragraph 48 because ☒ do not know if the statements in paragraph 48 are true.
49. I ☐ agree with the statements in paragraph 49. ☒ disagree with the statements in paragraph 49 because I never downloaded, reproduced, or distributed this file.
☐ do not know if the statements in paragraph 49 are true.
50. I ☐ agree with the statements in paragraph 50. ☐ disagree with the statements in paragraph 50 because ☒ do not know if the statements in paragraph 50 are true.
51. I ☐ agree with the statements in paragraph 51. ☒ disagree with the statements in paragraph 51 because I CAN ONLY SPEAK FOR MYSELF.
☐ do not know if the statements in paragraph 51 are true.
- ~~23. I ☐ agree with the statements in paragraph 23. ☒ disagree with the statements in paragraph 23 because ☒ do not know if the statements in paragraph 23 are true.~~
- ~~24. I ☐ agree with the statements in paragraph 24. ☐ disagree with the statements in paragraph 24 because ☐ do not know if the statements in paragraph 24 are true.~~
- ~~25. I ☐ agree with the statements in paragraph 25. ☐ disagree with the statements in paragraph 25 because ☐ do not know if the statements in paragraph 25 are true.~~
- ~~26. I ☐ agree with the statements in paragraph 26. ☐ disagree with the statements in paragraph 26 because ☐ do not know if the statements in paragraph 26 are true.~~
- ~~27. I ☐ agree with the statements in paragraph 27. ☐ disagree with the statements in paragraph 27 because ☐ do not know if the statements in paragraph 27 are true.~~
- ~~28. I ☐ agree with the statements in paragraph 28. ☐ disagree with the statements in paragraph 28 because ☐ do not know if the statements in paragraph 28 are true.~~
- ~~29. I ☐ agree with the statements in paragraph 29. ☐ disagree with the statements in paragraph 29 because ☐ do not know if the statements in paragraph 29 are true.~~
- ☒ continued on additional page(s).

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3rd copy - Proof of service

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STATE OF MICHIGAN
X JUDICIAL DISTRICT
JUDICIAL CIRCUITANSWER, CIVIL
(PAGE 7 OF 1) 7CASE NO.
4:16-cv-10751-TGB-APP

Plaintiff's name(s)

FATHERS & DAUGHTERS

v

Defendant's name(s)

Evan Keller

AFFIRMATIVE DEFENSES

☒ Defendant, ☐ Attorney for defendant, states the following affirmative defenses:

CHECK ALL THAT APPLY (for each box checked, attach a statement of facts)

- ☐ 1. I paid this debt in full (satisfied). Attached is proof of payment.
- ☐ 2. This action is barred by the statute of limitations because
- ☐ the plaintiff failed to sue within six years of _____, the last activity on the alleged account. MCL 600.5807(8).
Date
- ☐ the alleged contract involves a motor vehicle retail installment sales contract or the sale of other goods, and the plaintiff failed to sue within four years of _____, the last activity on the alleged account. MCL 440.2725(1).
Date
- ☐ the plaintiff failed to sue within three years after the alleged contract of sale of a mobile home on _____.
MCL 125.2333. Date
- ☐ 3. ☐ I paid an amount that the plaintiff accepted as payment in full (accord and satisfaction). Attached is proof of payment.
- ☐ The debt was discharged in bankruptcy. The case number was _____.
- ☐ 4. The contract is void or voidable because
- ☐ I was a minor when the alleged contract was made. My birth date is _____.
- ☐ I was not mentally competent when the alleged contract was made. Probate case number _____.
Attached are my letters of conservatorship/guardianship.
- ☐ there was no valid contract (no meeting of the minds) because I am not responsible for this copyright infringement and +
- ☐ 5. The contract was severely unjust or extremely one-sided (unconscionable).
- ☐ 6. I am not liable for the alleged damages because of the plaintiff's contributory negligence.
- ☐ 7. The alleged contract is unenforceable because it is not in writing (statute of frauds).
- ☐ 8. My vehicle was repossessed and later sold in a commercially unreasonable manner. MCL 440.9607(3).
- ☐ 9. The contract should not be enforced because of the plaintiff's improper conduct (fraud and/or duress).
- ☐ 10. The goods purchased were defective (failure of consideration).
- ☐ 11. The terms of the contract did not express what the parties intended (mutual mistake).
- ☐ 12. I have not been credited for all payments made on the alleged account. Attached is proof of payment.
- ☒ 13. Other: My IP address may have been used without my authorization. +
I am not responsible for this copyright infringement and have no knowledge of it or involvement.

Date

Defendant/Attorney signature

Evan Keller

Name (type or print)

FROM:

EVAN KELLEC

200 N OCCIDENTAL HWY #56

TECUMSEH, MI 49286

7015 1730 0002 3442 6418



1000



48220

U.S. POSTAGE
TECUMSEH, MI
49286
JUN 28 16
AMOUNT
\$4.66
R2304M110877-11

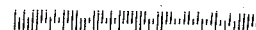
THEODORE LEVIN U.S. COURTHOUSE

231 W. LAFAYETTE BLVD., ROOM 564

DETROIT, MI 48226

Utility Mailer
10 1/2" x 16"

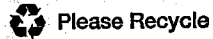
Ready Post



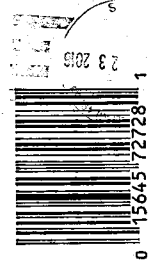
USPS.com

PULL TAB TO OPEN

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10" x 14" (usable inside dimension)



\$1.19
Utility Mailer



AIC-003
Product Code 93300004 - July 2013
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